

Proceeding: IN THE MATTER OF TELECOMMUNICATIONS RELAY SERVICES AND SPE ☒ Record 1 of 1

Applicant Name: Bob Segalman

Proceeding Name: 98-67 Author Name: Bob Segalman 15100753

Lawfirm Name:

Contact Name: Contact Email: Bob Segalman

Address Line 1: 3330 Tropicana Court

Address Line 2:

City: Sacramento

State: CA ☒

Zip Code: 95826 Postal Code:

Submission Type: RL ☒ Submission Status: ACCEPTED ☒ Viewing Status: UNRESTRICTED ☒

Subject:

DA Number:

Exparte Late Filed: ☐ File Number:

Calendar Date Filed: 09/05/1998 11:47:50 PM

Date Disseminated:

Filed From: EMAIL

Official Date Filed: 09/08/1998

Date Released/Denied:

Initials:

Confirmation #

Date Filed:

DOCKET FILE COPY ORIGINAL

INTERNET FILING

98-67

918198

Reply Comments about Speech-to-Speech from :

Bob Segalman, Ph.D.
Founder of Speech-to-Speech

About 80% of comments to the FCC on Speech-to-Speech (STS) were positive. Most commenters favored all carriers providing service within two years.

I will respond to the negative comments that were filed about STS in response to the NPRM Proceeding 98-67. To the best of my knowledge, I speak for the majority of consumers. A great proportion of consumers will be unable to file reply comments because of the severity of their disability. Like many consumers, I have profound cerebral palsy.

1. Comments to the FCC from several vendors outside the speech disabled community reveal that they have not been informed of the necessity of providing adequate STS outreach. For STS to be a viable service, vendors or state contract administrators in each state must insure that there is sufficient outreach to develop an adequate user base.

Currently, several states provide STS without sufficient outreach, and the call volume is extremely low in those states. This speech disabled community is unable to use STS without extensive outreach.

The very successful California outreach plan is in the public domain. Write to me at bob.segalman@worldnet.att.net if you want a copy.

Unlike the deaf community (that had TTYs long before they had relay), people with speech disabilities did not use the telephone prior to the availability of STS; thus, they don't have an inherent grasp of how useful the telephone and STS can be to them. Outreach staff must teach consumers to use STS one by one. Staff must also teach consumers to overcome the practical, social, and psychological barriers to using it. California did this successfully as demonstrated by its outbound call volume of 4,000 calls a month.

Examples of States with inadequate outreach:

Bell Atlantic questions if Speech-to-Speech should be a mandatory service because of the low STS call volume in Maryland. One primary reason for the low call volume in Maryland (compared with the high call volume in California) is the lack of an extensive Speech-to-Speech outreach program in Maryland.

On the contrary, the Maryland Department of Budget and Management which monitors Speech-to-Speech in Maryland favors providing Speech-to-Speech throughout the US, despite the low call volumes in Maryland. Clearly Maryland's call volume problem can be solved with a \$100k annual investment in outreach activity.

AT&T had concerns about making STS mandatory because of the low call volume of its Speech-to-Speech program in Georgia. Again, Georgia lacks an outreach program specific to the STS community. If such an outreach is established, call volumes could greatly increase.

California has an extensive Speech-to-Speech Outreach program and consumers make about 4,000 outbound Speech-to-Speech

calls a month. California's outreach program for the first year cost only \$160,000 and was well worth the money.

2. "Confidentiality" must be defined differently for STS than for TTY relay. MCI's request that confidentiality should be defined for STS as it is for TTY relay is inappropriate given the nature of the speech disabled population.

For STS to work effectively, the following (A through E below) differences from TTY relay's definition of confidentiality must be employed. This list of five differences come from the California Relay Service contract section on STS:

I suggest that Section 64.604 is further revised to read as follows:

"• 64.604. Mandatory minimum standards.

(a) Operational standards -

(1) * * *

(2) Confidentiality and conversation content. Except as authorized by section 705 of the Communications Act, 47 U.S.C. 605, CAs are prohibited from disclosing the content of any relayed conversation regardless of content and from keeping records of the content of any conversation beyond the duration of a call, even if to do so would be inconsistent with state or local law. FOR STS THE WORD "CALL" APPLIES TO AN INCOMING CALL. CAs are prohibited from intentionally altering a relayed conversation and, to the extent that it is not inconsistent with federal, state, or local law regarding use of telephone company facilities for illegal purposes, must relay all conversation verbatim unless the user specifically requests summarization. In the event a CA encounters a automated voice-menu or audiotext system during a relay call, and the CA cannot relay the call and interact with the automated system simultaneously in a functionally equivalent manner, the CA is allowed to alert the TRS user that an automated system is present and inquire whether the user wants the CA to summarize the message or listen for a specific message.

"To be more specific:

A. While CAs may not counsel, advise, or interject personal opinions into a conversation, they may ask questions to clarify what was said particularly if the meaning or context is unclear. ("Apple" differs from "ample", "articulate" differs from "article", "interest" differs from "inter-test", "pants" differs from "Lance".) Never guess what somebody says!

B. CAs may interact with users having a problem using the service and to reassure new users. CAs may reassure users that the user was understood.

C. CAs also may interact with users to help the user use the service more effectively. This is particularly necessary in helping developmentally delayed users with short-term memory

loss. For example, they may correct a telephone number that the user receives from one caller and then repeats in error to the agent in requesting another call. CAs must never attempt to assist users in ways that could interfere with the user's independence. The above directions may appear self-contradictory but are not in light of the wide variance in intellectual capacity within this user group. An opportunity for a CA to facilitate communication takes priority over transparency. However, the agent must not facilitate if there is a great risk of diminishing communication.

D. Given the limited telephone experience and delayed social development of some users, CAs will prompt users leaving messages on answering machines who forget to leave their name and/or telephone number.

E. CAs will avoid informality interpretable by users as patronizing. Adult users must always be treated as mature adults regardless of their behavior."*

*Paragraph A through E come from the California Relay Service contract between the California Public Utilities Commission and MCI.

3. The United Cerebral Palsy Association submitted one comment as a national organization rather than asking local units and consumers to reply. Please understand that that one comment represents the support of Speech-to-Speech by thousands of consumers, many of whom have disabilities which make them unable to prepare their own comments.

4. Emergency services for people with moderate speech disabilities need to be provided through Speech-to-Speech. People with speech disabilities cannot be understood by regular 911 operators and it is not cost effective to train all 911 operators on how to answer calls from people with speech disabilities given the small number of 911 calls to be made by people with speech disabilities.

5. STS can be offered cost effectively even in very small states in a way that would eliminate the Idaho PUC's fiscal concern about low call volume.

I agree that Idaho should subcontract with an STS provider in a larger state to provide Idaho with Speech-to-Speech in a cost effective manner. This would eliminate concerns about CA wages and efficiency. For this reason, I agree with Bell Atlantic that regional STS centers would make STS more effective.

6. SHHH is correct that Speech-to-Speech may be very useful to some people with hearing loss.

7. STS needs to have the same answer time requirements as other relay services. In California, full-time STS service began with no penalty for the vendor not providing prompt answer time. During those periods when the answer was slow (up to 10 minutes), consumers sometimes refused to use STS.

This slow answer time occurred during a trial service when no answer time requirements were in effect for the provider. Now that the California provider is required to meet the same answer time and blockage rate requirements as for regular CRS, those requirements are being met. It is therefore, possible for a provider to meet such requirements for STS.

Thus, United Cerebral Palsy is correct when they say: "We believe there is no reason to relax the speed of answer time."

While MCI has bottom line concerns for not wanting mandated answer time requirements, STS cannot survive without answer time requirements that are the same as the TTY relay.

8. I oppose Ameritech's request that:

"..., the Commission should not adopt its rule requiring communications assistants not to take on new TRS calls within their last ten minutes before leaving work, which would hamper the scheduling process at TRS centers. At the very least, the Commission should cut the ten-minute period to five minutes."

Ameritech needs to build the scheduling cost into their bid. Ameritech could bid differently for TTY relay and Speech-to-Speech. My reasoning is that because the psychological effect of changing CAs during a call is often disruptive to people with speech disabilities, minimum time-on-call shall be established to which CAs shall be required to conform. In the initial stages of a call, there is a settling-in time whereby the caller and the CA get accustomed to each other. During this time the caller with the speech disability develops the assurance that the CA will understand him/her. Rotation of a CA during a call disrupts this assurance and the speech disabled consumer's confidence, and may actually cause the user to speak less clearly.

9. Relaxing the 30 second answer time requirement makes sense. United Cerebral Palsy is correct that:

"While the length of time that elapses from the time the communications assistant (CA) answers the inbound call and when the outbound call begins may be prolonged because of speaking time, I recommend that quality control standards, such as speed in answering calls should be the same as for TTY relay."

10. Southwestern Bell and the Kansas Relay Service both expect difficulty serving people with very severe speech disabilities. Yet serving such people is not an issue as STS is not designed to serve people with very severe speech disabilities.

STS is designed only for use by people with speech understandable to a patient person with excellent hearing. In

California, that now includes a user base of estimated at about 150 people. Users determine themselves, by experience, whether they talk well enough to use STS. If they can make themselves understand to the CA's, then they use STS; if they can not make themselves understood, then they stop using STS after a few calls, as the process becomes too frustrating.

Southwestern Bell does not want STS to be mandatory because it thinks that CA's might be difficult to find and train. SBC has never identified or trained potential CAs, I have! I had no difficulty finding and training CAs. I guided both Sprint and MCI in identifying potential STS CAs from among the TTY CA's in their employ at the time. We simply picked the most patient CAs with the best hearing and gave them each 1-2 days training. The majority of them do a fine job.

SBC notes the difficulty in finding instructors for STS CAs. Yet the detailed curriculum that I used to train many current CAs is in the public domain. MCI and Sprint probably still use it. Any trainer of TTY relay CA's should be able to train STS CAs after reading my curriculum.

SBC expects difficulty in finding STS instructors for every relay center. Yet STS will probably be offered from only 3 or 4 centers nationally - so one or two instructors could serve the whole country. Thus, difficulty finding and training CAs is not a reason to avoid making STS mandatory in two years.

11. The cost of STS is reasonable. Sprint is, in fact, providing it in Maryland at the same per minute cost as regular relay.

GTE also discusses cost: "GTE is concerned, however, that, in Hawaii, it will be required to implement an STS capability before adequate funding is available. For this reason, GTE asks the Commission to rule either (1) that states may set the implementation schedule for STS based on their ability to provide funding; or (2) that TRS providers in a state need not provide STS until adequate funding is available from the state."

In evaluating GTE's funding funding (see above), the FCC should note that people with speech disabilities do not have the political power to assure quick and adequate funding. So if the FCC allows vendors to wait for state funding, then STS may never become a reality in many states.

Yet cost should not be an issue as the cost of STS is very low. In California, STS costs about \$0.6m a year, compared with TTY relay which costs about \$20m a year. With that low cost, it does not appear ethical to make users wait more than two years for service.

12. The comments of the Kansas Relay Service, Inc. state that they have no experience handling STS calls. This explains why KRSI does not understand that STS is designed only for use by people with speech understandable to a patient person with excellent hearing. Because of that misunderstanding, KRSI

inappropriately discusses providing STS to people with very severe speech disabilities. KRSI questions the FCC's recommendations for STS based on their misunderstanding of the function of STS.

Also because of that misunderstanding, KRSI recommends extensive "individual service" not now being offered by any STS vendor. Such service would be impractical and very expensive to provide.

KRSI asks that the FCC not require STS to be offered only on a regional or national basis. Yet, it would not appear cost effective for a single state to offer Speech-to-Speech. California probably will always have the largest user base. Currently, California has an estimated 150 users. For such a small user base, regional and national providers appear more practical.

- Bob Segalman, PhD
Founder of Speech-to-Speech